

EXHIBIT 03

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*ADMITTED IN WASHINGTON

July 17, 2023

VIA EMAIL ONLY

Ms. Christelle Samson
Vice-Consule
French Consulate
christelle.samson@diplomatie.gouv.fr

Re: Arnaud Paris and Heidi Brown

Dear Ms. Samson:

I am an attorney in Oregon. I represent Mr. Arnaud Paris in his ongoing custody dispute with the mother of his children, Ms. Heidi Brown. The matter is pending in the Circuit Court for the State of Oregon in the County of Jackson, case number 22DR17285. There is also a companion case in the same county under case number 23DR08269. That case involves the registration and enforcement of the French custody judgment that Mr. Paris obtained in April of this year.

Mr. Paris has asked me to write to you to advise you of the status of the matters pending in Oregon. At this point in time, there is a motion to dismiss Ms. Brown's custody and parenting time claims on the basis that Oregon lacks subject matter jurisdiction to make that determination. We have made several court appearances on that motion, and we return to court tomorrow for another full day of hearing. It is doubtful that the case will be resolved tomorrow but I recommended to Mr. Paris that considering the proximity of this hearing, it would be helpful to attend it tomorrow in person since he is supposed to finish testifying on the witness stand. Nevertheless, you should know that at the close of the hearing last week, the judge indicated that if we do not finish dealing with his case at the hearing tomorrow, the matter will probably be scheduled for further proceedings in September.

I also wish to advise you that at this point, the court in Oregon has not determined if it has subject matter jurisdiction to make a custody ruling, and to date it has not made any such determination.

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Furthermore, Mr. Paris has registered his French judgment in Oregon. According to Oregon law, it is effective upon registration. Having said that, you should be aware that Ms. Brown has filed an objection to the registration, and that objection is being heard simultaneously with the motion to dismiss her custody proceedings. But there is nothing in Oregon law that says that an objection to a registration that is already effective is suspending the effectiveness of such French judgement.

Please do not hesitate to contact me if you have any questions.

Sincerely,

SCHULTE, ANDERSON, DOWNES,
ARONSON & BITTNER P.C.

Thomas A. Bittner

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